

O'Reilly, Charles A. (TAX)

From: Oscar Stilley [oscar@oscarstilley.com]
Sent: Friday, September 25, 2009 4:50 PM
To: O'Reilly, Charles A. (TAX); Lindsey Springer
Cc: Snoke, Ken (USAOKN); Hall, Kathie (USAOKN)
Subject: RE: Proposed Deposition Pursuant to Rule 15 of Vikki Wiggins

Gentlemen:

I oppose this motion for several reasons. Amongst others, it takes up roughly 10% of the time between now and trial. I don't see how we can justify taking this much time on a single witness. Working this into an already tight schedule is going to be very difficult. I haven't seen Ms. Wiggins' facts and evidence, but I would think that the better solution is to accommodate her as much as possible on the travel arrangements and wait time, and simply let her testify in trial.

Please let me see the facts Ms. Wiggins puts forth, as soon as it is available to you. If such information changes my mind I will let you know.

Thanks very much,

Oscar Stilley
os

Oscar Stilley, Attorney at Law¹
7103 Race Track Loop
Fort Smith, AR 72916
(479) 996.4109 phone
(866) 673.0176 fax
oscar@oscarstilley.com
www.oscarstilley.com

IMPORTANT: The information contained in this email message is intended only for the individual/entity named herein. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone and destroy all originals and copies of this message. Receipt by anyone other than the intended recipient is not a waiver of any attorney-client or work product privilege. Footnote 1: [Suspended from Arkansas courts pending disbarment, principally for the alleged offense of criticizing the government. Suspended in some but not all other jurisdictions to which Attorney is admitted. Ask for details, it's complicated.]

From: O'Reilly, Charles A. (TAX) [mailto:Charles.A.O'Reilly@usdoj.gov]
Sent: Friday, September 25, 2009 9:25 AM
To: Oscar Stilley; Lindsey Springer
Cc: Snoke, Ken (USAOKN); Hall, Kathie (USAOKN)
Subject: Proposed Deposition Pursuant to Rule 15 of Vikki Wiggins

Mssrs. Springer and Stilley:

We have been informed by Ms. Wiggins that her health does not permit her to travel. She has indicated she will forward a letter from her doctor attesting to this fact. We intend to ask the Court to authorize a deposition pursuant to Rule 15 of the Federal Rules of Criminal Procedure. As part of that motion, we would like to be able to inform the Court of your position with respect to that motion.

Thank you in advance for your attention.

Charles O'Reilly
Special Assistant U.S. Attorney

9/25/2009